

**THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	BK. No. 5:13-05368 RNO
YVONNE HILL	:	
Debtor	:	Chapter No. 07
	:	
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	:	11 U.S.C. §362
Movant	:	
v.	:	
YVONNE HILL	:	
Respondent	:	

**ANSWER TO MOTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
FOR RELIEF FROM AUTOMATIC STAY UNDER §362 PURSUANT TO
BANKRUPTCY PROCEDURE RULE 4001**

NOW COMES Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Deutsche Bank National Trust Company for Automatic Stay, as follows:

1. Admitted.
2. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph two and strict proof thereof is demanded.
3. Admitted.
4. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph four and strict proof thereof is demanded.

5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors scheduled for March 9, 2017.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded.

9. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph nine and strict proof thereof is demanded.

10. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph ten and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

11. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eleven and strict proof thereof is demanded.

12. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twelve and strict proof thereof is demanded.

13. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph thirteen and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

14. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph fourteen and strict proof thereof is demanded.

15. Admitted.

16. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph sixteen and strict proof thereof is demanded.

WHEREFORE, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court;

a. Deny Movant's request to modify the Automatic Stay under Section 362 with respect to 430 Hunter Drive, Pocono Summit, PA to proceed with its rights under the terms of said mortgage; and

- b. Deny Movant's request to communicate with the Debtor and Debtor's counsel to comply with applicable nonbankruptcy law; and
- c. Deny Movant's request to enforce and implement the Order granting relief from the automatic stay; and
- d. Deny Movant's request for other relief.

Dated: February 13, 2017

/s/ Jill M. Spott
Jill M. Spott, Esquire
Attorney for Trustee
108 North Abington Road
Clarks Summit, PA 18411
(570) 587-2600 – Telephone
(570) 585-0313 - Facsimile
jspottesq@sheilslaw.com